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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
(DKT. 1423)**

14 vs.

15 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
16 LLC,

17 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal Portions of Its Opposition to Defendants’ Motion for Summary Judgment (“Waymo’s
 8 Opposition”) and exhibits thereto, filed concurrently herewith (the “Administrative Motion”). The
 9 Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Opposition	Highlighted portions	Waymo (green highlighting), Defendants (blue highlighting), third party Velodyne (yellow highlighting)
Exhibit 1 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 3 to Jaffe Declaration	Entire document	Defendants; Waymo (green highlighting)
Exhibits 4-6 to Jaffe Declaration	Entire documents	Third party Velodyne
Exhibit 7 to Jaffe Declaration	Highlighted portions	Waymo (green highlighting)
Exhibit 8 to Jaffe Declaration	Entire document	Waymo
Exhibit 9 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 10 to Jaffe Declaration	Entire document	Waymo
Exhibit 11 to Jaffe Declaration	Entire document	Waymo
Exhibit 12 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 13 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibits 14-16 to Jaffe Declaration	Highlighted portions	Waymo (green highlighting)
Exhibit 18 to Jaffe Declaration	Entire document	Waymo and Defendants
Exhibit 21 to Jaffe	Highlighted portions	Waymo (green

1	Declaration		highlighting)
2	Exhibits 22-23 to Jaffe Declaration	Entire documents	Third party Velodyne
3	Exhibit 24 to Jaffe Declaration	Entire document	Third party Velodyne
4	Exhibit 25 to Jaffe Declaration	Highlighted portions	Waymo (green highlighting); Defendants (blue highlighting)
5	Exhibit 26 to Jaffe Declaration	Entire document	Third party Lior Ron; Defendants (red highlighting)
6	Exhibit 27 to Jaffe Declaration	Entire document	Waymo and Defendants
7	Exhibits 28-30 to Jaffe Declaration	Highlighted portions	Defendants (red and blue highlighting)
8	Exhibit 31 to Jaffe Declaration	Entire document	Defendants

12 3. Specifically, the green highlighted portions of Waymo's Opposition and Exhibits 3, 7,
 13 21, and 25 to the Jaffe Declaration, as well as the entirety of Exhibits 1, 8-11, 13, 18, and 27 to the
 14 Jaffe Declaration, contain or refer to trade secret information, which Waymo seeks to seal.

15 4. The green highlighted portions of Waymo's Opposition, Exhibits 3, 7, 21, and 25 to the
 16 Jaffe Declaration, as well as the entirety of Exhibits 1, 8-13, 18, and 27 to the Jaffe Declaration,
 17 contain, reference, describe, and/or have a tendency to disclose Waymo's trade secrets. The
 18 information Waymo seeks to seal includes the confidential design and functionality of Waymo's
 19 proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as
 20 secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that
 21 the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of this
 22 information would give Waymo's competitors access to descriptions of the functionality or features of
 23 Waymo's autonomous vehicle system. If such information were made public, I understand that
 24 Waymo's competitive standing would be significantly harmed.

25 5. Waymo's request to seal is narrowly tailored to those portions of Waymo's Opposition
 26 and Exhibits 1, 3, 7-13, 18, 21, 25, and 27 that merit sealing.

1 6. Waymo seeks to seal the portions of Waymo's Opposition and Exhibits 3-6, 22-26, and
2 28-31 identified in the table above because Waymo believes such information is considered
3 confidential or non-public by Defendants or by third parties Velodyne or Lior Ron. To the extent
4 Velodyne does not support sealing its confidential information, Waymo may support sealing portions
5 thereof having a tendency to disclose Waymo's trade secrets.

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7 I declare under penalty of perjury under the laws of the State of California and the United
8 States of America that the foregoing is true and correct, and that this declaration was executed in San
9 Francisco, California, on September 12, 2017.

10 By /s/ Felipe Corredor
11 Felipe Corredor
12 Attorneys for WAYMO LLC
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15 **SIGNATURE ATTESTATION**

16 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
17 filing of this document has been obtained from Felipe Corredor.

18 /s/ Charles K. Verhoeven
19 Charles K. Verhoeven
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